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The Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *United States v. Sylvia Ash*, 19 Cr. 00780 (LAK)

Dear Judge Kaplan:

We respectfully write on behalf of our client, Sylvia Ash, in the above reference matter to request an extension of time to submit motions, which currently are due March 6, 2020 (with the Government's reply due March 20, 2020 and oral argument scheduled for April 1, 2020). My firm recently was retained and has begun to review the discovery but needs additional time to determine what, if any, motions to file. I have conferred with the Government and it takes no position on our request to file any motions by March 20, 2020 with the Government's reply due April 3 and oral argument to be scheduled on a date thereafter based on the Court's schedule.

Respectfully submitted,



Carrie H. Cohen

cc by ECF: AUSA Daniel Richenthal  
G. Michael Bellinger, Esq. (counsel for Sylvia Ash)